

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 8, 2020

VIA ECF

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Miguel Angel Martinez
19 Cr. 681 (NRB)**

Dear Judge Buchwald:

I write, with no objection from Pretrial Services or from the Government, to respectfully request that the Court modify the conditions of Mr. Martinez's bail to remove the condition of location monitoring.

On September 6, 2019, Magistrate Judge Netburn imposed bail conditions, including the following: a \$100,000 personal recognizance bond to be cosigned by four financially responsible persons and secured by \$1,000; travel restricted to the Southern and Eastern Districts of New York; home detention; that Mr. Martinez reside with his mother, and that she serve as a third-party custodian; and the surrender of travel documents with no new applications. These conditions were modified by Magistrate Judge Cott on September 9, 2019 to changing the place of residence to Mr. Martinez's sister's home. Mr. Martinez has been in full compliance with the conditions previously imposed.

On February 21, 2020, the Court modified Mr. Martinez's bail to remove the condition of home detention and instead imposed a curfew with location monitoring.

Given Mr. Martinez's full compliance of his conditions of release for approximately one year, it is respectfully submitted that location monitoring is no longer necessary and that Mr. Martinez's bond conditions should be modified to remove such condition.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Amy Gallicchio

Amy Gallicchio
Assistant Federal Defender
Tel.: (212) 417-8782

cc: AUSA Emily Johnson
PTSO Bernisa Mejia (via email)

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Buchwald,
10/8/20
9/9/20